



TITLE V OPERATING PERMIT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

Title V Permit Number	178-0090-TV
Client/Sequence/Town/Premises Numbers	5889/01/178/8
Date Issued	July 7, 2006
Expiration Date	July 7, 2011

Corporation:

Ross & Roberts, Inc.

Premises location:

1299 West Broad Street, Stratford, CT 06615

Name of Responsible Official and Title:

Dr. Samuel J. Rosenberg - Vice President

All the following attached pages, 2 through 27, are hereby incorporated by reference into this Title V Operating Permit.

GINA MCCARTHY
Gina McCarthy
Commissioner

7/7/06
Date

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LIST OF ACRONYMS

<i>Acronym</i>	<i>Description</i>
ACFM	Actual cubic feet per minute
ASC	Actual Stack Concentration
BACT	Best Available Control Technology
BAM	Bureau of Air Management
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CP/OP	Construction Permit/Operating Permit
CTG	Control Technology Guideline
DEP	Department of Environmental Protection
DSCF	Dry standard cubic feet
DSCM	Dry standard cubic meters
EMU	Emissions Unit
ERC	Emission Reduction Credit
EPA	Environmental Protection Agency
FLER	Full load emission rate
GEMU	Grouped Emissions Unit
GPH	Gallons per hour
GPM	Gallons per minute
HAP	Hazardous Air Pollutant
HLV	Hazard Limiting Value
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MASC	Maximum Allowable Stack Concentration
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSR	New Source Review
PM	Particulate Matter
PPMV	Parts per million, volumetric basis
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
RMP	Risk Management Plan
SIC	Source Identification Code
SIP	State Implementation Plan
TOC	Total Organic Carbon
TPH	Tons per hour
TPY	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

Title V Operating Permit

All conditions in Sections III through IX of this permit are enforceable by both the Administrator and the Commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Sections III and IV of this permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III through IX, except for Section VII, of this permit in accordance with the Clean Air Act (CAA), as amended.

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Manufacturer of Vinyl Fabric Products, Selling Rolls of Finished Fabric to Makers of Wall Coverings, Upholstery and Wearing Apparel.

Primary SIC: 3081; 3083; & 3089

Facility Mailing Address: Ross & Roberts, Inc.
1299 West Broad Street
Stratford, Connecticut 06615

Telephone Number: (203) 378-9363

B. PREMISES DESCRIPTION

Ross & Roberts, Inc. manufactures vinyl fabric products of various types, selling rolls of finished fabric to makers of wall coverings, upholstery and apparel.

There are three manufacturing procedures in the premises. The materials produced in the first manufacturing procedure are calender films. The processes include a Banbury for mixing raw materials, a mill for further mixing, a strainer for filtering out impurities, and a calender for forming the vinyl ribbon into a vinyl sheet that meets the customer's requirements. The raw materials consist of powdered PVC resins, liquid plasticizers, liquid stabilizers, and powdered or liquid pigments. A fiberbed filter unit controls the particulate matter in the exhaust air.

The second procedure involves the application of decorative and protective water-based inks and/or topcoats on the vinyl sheets and then lamination of the sheets to a fabric backing. The VOC content in the applied raw materials is kept under 3.8 lbs VOC/gal in accordance with RCSA 22a-174-20(o)(2)(B), Fabric and Vinyl Coating. The emissions are vented to the roof by three fans.

The third procedure involves the weighing, mixing and blending of raw materials consisting of powdered resins, liquid plasticizers, liquid stabilizers and powdered or liquid pigments to form substrate materials. Then the substrate materials are put on a process line and then passed through an oven to dry. VOC emissions occur during the heating in the ovens. The VOC content in the applied raw materials is less than 2.9 lbs of VOC/gal in accordance with RCSA 22a-174-20(q)(2), Paper Coating. The process line along with the oven is called the coating line. There are two coating lines. A wet scrubber followed by electrostatic precipitator controls the exhaust air from the coating lines.

Ross & Roberts, Inc. is under a VOC RACT consent order#8237 from the Department. The order was issued on October 4, 2002.

The first procedure is not a coating line and thus not subject to 40 CFR 60 Subpart FFF. The second and third procedures are currently not subject to 40 CFR 60 Subpart FFF, flexible vinyl and urethane coating and printing. If the units are modified, Ross & Roberts, Inc. must comply with the Subpart FFF. The premise is not major for HAPs and therefore not subject to any MACT, including those related to Hazardous Air Pollutants at 40 CFR 63 Subparts JJJJ and OOOO.

Section II: Emissions Unit Description

EMISSIONS UNITS IDENTIFICATION:

Emissions Units are set forth in Table II

TABLE II: EMISSIONS UNIT DESCRIPTION				
Emissions Units	Grouped Emissions Units	Emissions Unit Description	Control Unit Description	Permit, Order, Registration #; or NSPS*
EMU 1	GEMU 1	Calender B, Micropul Model 1215-10-20, Serial # 75-H-250	Fiberbed Filter unit, Advanced Environmental Systems, Inc. for the control of particulate matter.	178-0048-R; Consent Order #8237
EMU 2	GEMU 1	Calender C, Micropul Model 1215-10-20, Serial # 75-H-251	Fiberbed Filter unit, Advanced Environmental Systems, Inc. for the control of particulate matter.	178-0049-R; Consent Order #8237
EMU 3	GEMU 1	Fugitive Emissions from the Calender Area including the Color Room, Mixer/blenders, and the Silos	<ol style="list-style-type: none"> 1. Fiberbed Filter unit, Advanced Environmental Systems, Inc. 2. Electrostatic Precipitator, SMOG HOG, Serial # 8908. 3. Baghouse on the Color Room. 4. Baghouse on Mixers/Blenders. 5. Filters on Silos 	Consent Order #8237
EMU 4	GEMU 2	New Liberty Laminating Line	None	None
EMU 5	GEMU 2	Roto Laminating Line	None	178-0044-R
EMU 6	GEMU 2	Old Liberty Laminating Line	None	178-0043-R
EMU 7	GEMU 3	Coating Line and Wolverine Oven #1	Wet Scrubber & Electrostatic Precipitator	178-0040-R
EMU 8	GEMU 3	Coating Line and Wolverine Oven #2	Wet Scrubber & Electrostatic Precipitator	178-0041-R
EMU 9	GEMU 3	Fugitive Emissions from the Coating Lines Area	Plastisol Mixing Baghouse, Sly Model #J-2227	None
EMU 10		Bigelow Boiler, Model #HP-50, S/N 12729, 750 HP	None	178-0039-R

* It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V permit.

Section III: Applicable Requirements

The following tables contain terms and conditions for the operation of each identified emissions unit, and Operating Scenario regulated by this permit.

A. GROUPED EMISSIONS UNIT 1

Table III.A: Grouped Emissions Unit 1 (GEMU 1)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. VOC	<p>1.i. The permittee shall limit the average monthly emissions of VOCs generated from the use of raw materials in GEMU 1 to at or below 0.002 lbs of VOC/ lbs of material produced in GEMU 1.</p> <p>1.ii. The permittee shall limit the annual emissions of VOCs generated from GEMU 1 to below 30 tons per year.</p>	<p>1.i. Consent Order #8237</p> <p>1.ii. Consent Order #8237</p>
2. Particulate Matter	2.i. For each EMU in the grouped emissions unit (GEMU 1), the permittee shall not cause or permit the discharge from a stack into the atmosphere of more than 7.18 pounds of particulate matter in any one hour.	2.i. RCSA 22a-174-18(e)(1)

B. GROUPED EMISSIONS UNIT 2

Table III.B: Grouped Emissions Unit 2 (GEMU 2)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. VOC	1.i. For each EMU in the grouped Emissions Unit (GEMU 2), the permittee shall not cause or permit the discharge from a stack into the atmosphere of any VOC from any coating in excess of 3.8 lbs/gal.	1.i. RCSA 22a-174-20(o)(2)(B)

C. GROUPED EMISSIONS UNIT 3

Table III.C: Grouped Emissions Unit 3 (EMU 3)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. VOC	1.i. For each EMU in the grouped emissions unit (GEMU 3), the permittee shall not cause or permit the discharge from a stack into the atmosphere of any VOC from any coating in excess of 2.9 lbs/gal.	1.i. RCSA 22a-174-20(o)(2)(A); RCSA 22a-174-20(q)(2)

Section III: Applicable Requirements

D. EMISSIONS UNIT 10

Table III.D: Grouped Emissions Unit 10 (EMU 10)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. TSP	1. The permittee shall limit the emissions of PM to no more than 0.14 lb/MMBtu of heat input.	1. RCSA 22a-174-18(e)(2)(A)
2. SO _x	2. The permittee shall not use or burn fuel, which contain sulfur in excess of a maximum of one percent (1.0%) by weight.	2. RCSA 22a-174-19(a)(2)

E. 112(r) ACCIDENTAL RELEASE REQUIREMENTS

Should any of the units, as defined in 40 CFR section 68.3, become subject to the accidental release prevention regulations in part 68, then the permittee shall submit a risk management plan (RMP) pursuant to 40 CFR section 68.12 by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR section 70.6(c)(5).

F. STRATOSPHERIC OZONE DEPLETING SUBSTANCES (40 CFR SUBPART 82) REQUIREMENTS

The permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart F.

Section IV: Compliance Demonstration

A. GROUPED EMISSIONS UNITS 1 (GEMU 1)

The monitoring, record keeping, and reporting requirements shall be for each emissions unit in the grouped emissions unit (GEMU 1).

1. Monitoring Requirements

i. Pollutants or Process Parameters: VOC

- a. The permittee shall operate a Fiberbed Emission Control (FEC) system, or a replacement system as defined in Section IV.A.1.i.c of this permit, with GEMU 1, which has demonstrated it can reduce particulate matter and VOC emissions.
- b. The FEC shall achieve an overall control efficiency of 25% of VOC (measured as total hydrocarbons). [Consent Order #8237]
- c. A replacement capture system and/or control device may be used to control VOC emissions provided it achieves at least the same VOC capture and control efficiencies, measured as total hydrocarbons, as the FEC. Notwithstanding, if the replacement control device is subject to requirements of Section 22a-174-32(e)(2)(B) or (C) or permit requirements, the more stringent control efficiency shall apply. Any replacement capture efficiency or control device must be approved by the Commissioner and the Administrator.[Consent Order #8237]GEMU 1 shall not be operated unless the FEC system or a replacement system is operating in accordance with this permit. [Consent Order #8237]
- d. The permittee shall operate and maintain the FEC system or it's replacement in accordance with the manufacturer's recommendations. [Consent Order #8237]
- e. The permittee shall calculate VOC emissions during each and every consecutive twelve (12) months. The annual usage shall be determined by the permittee by adding the current month's material usage to that of the previous eleven (11) months. These calculations shall be made by the permittee on a monthly basis and made available for inspection by the Department upon request. [Consent Order #8237]
- f. The permittee shall replace the FEC filters when the pressure drop reaches 12 inches W.C. or if the variable frequency of the fan drive reaches 100%, whichever occurs first. [Consent Order #8237]
- g. The permittee shall maintain at the facility, a set of replacement FEC filters. [Consent Order #8237]
- h. In Consent Order to show compliance with the percent efficiency requirements as stated in Section IV.A.1.b of this permit, the permittee shall conduct VOC capture and control emission testing pursuant to Section IV.A.1.j of this permit. Such testing shall be completed by the last day of May every five years following the date such testing was last conducted. [Consent Order #8237]
- i. The emissions testing required in Section IV.A.1.i of this permit shall be conducted and reported as follows: [Consent Order #8237]
 1. The permittee shall submit an Intent-to-Test (ITT) package consisting of an ITT form (Form AE404) and a test protocol;
 2. The package shall include a detailed description of all aspects of facility operations (e.g. type and quality of raw materials utilized) and of any air pollutant control equipment in use (e.g. screen mesh size, control equipment efficiency) which may affect emissions testing results, and how and when such information may be monitored;

Section IV: Compliance Demonstration

GEMU 1

3. A detailed description of each emissions testing and analytical methodology to be utilized provided that all such methodologies shall conform to those approved by the U.S. EPA and the Commissioner; and
4. A description of each discharge point at which emissions testing is to be conducted.
- j. The permittee shall provide to the Commissioner any information that the Commissioner deems necessary to review the permittee's ITT protocol. Within sixty (60) days after the Commissioner approves an ITT protocol, the permittee shall complete emissions testing in accordance therewith. The permittee shall schedule all emissions testing so as to allow the Commissioner to be present during such testing and to independently verify relevant facility operations, air pollution control equipment parameters, and testing procedures. Within sixty (60) days after completing any emissions testing required by this permit, the permittee shall submit to the Commissioner a written report providing the results of such testing; within fifteen (15) days of a notice from the Commissioner indicating any deficiencies in such report, the permittee shall submit a revised report. [Consent Order #8237]

ii. *Pollutants or Process Parameters: Particulate Matter*

- a. Compliance with the particulate emission limitation shall be achieved with the use of a manufacturer guaranteed FEC system. [RCSA Section 22a-174-33(j)(1)(K)]
- b. The FEC shall achieve a 78% removal efficiency of particulate matter and a 16.1% removal efficiency of Condensable Organic Compounds (COCs). [Consent Order #8237]
- c. The permittee shall calculate particulate matter emissions during each and every consecutive twelve (12) months. The particulate matter emissions shall be based on mass balance calculations. The annual usage shall be determined by the permittee by adding the current month's material usage to that of the previous eleven (11) months. These calculations shall be made by the permittee on a monthly basis and made available for inspection by the Department upon request. [RCSA Section 22a-174-33(j)(1)(K)]
- d. If required by the commissioner, the permittee shall measure particulate matter, condensable organic compounds emissions, and control efficiency using EPA Methods 5 and 202. [RCSA Section 22a-174-5(e)(2)]

2. **Record Keeping Requirements:**

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall make and keep such records that are necessary to reliably calculate actual monthly and annual emissions of VOCs from the calendar lines in order to demonstrate compliance with the emission limitations specified in Section III.A.1 of this permit. [Consent Order #8237]
- b. The permittee shall keep purchase records for all materials containing VOC which are used or stored at the premises. [RCSA 22a-174-32(g)(1)(A)]
- c. The permittee shall maintain daily records of the materials, which contain VOC, used on the premises. The records shall be used, by the permittee, in calculating the monthly VOC emissions and shall contain: [Section 22a-174-32(g)(1)(B); RCSA 22a-174-32(d)]
 1. The name and address of the material manufacturer;
 2. The date the material is used;
 3. The description of the material including the material name and the material density in pounds per gallon;

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GEMU 1

4. The percent VOC content by weight;
 5. The water and exempt volatile organic compound content by weight of the material;
 6. The non-volatile content by volume and by weight of the material;
 7. The amount of each material used in gallons;
 8. The total amount of diluent used for each material in pounds and in gallons;
 9. The cumulative record of year-to-date material usage in pounds per gallon;
 10. The material viscosity in pounds VOC per pounds solid, or in kilograms VOC per kilogram solid.
- d. The permittee shall keep the calculation of the weighted arithmetic mean of the VOC content of all coatings used at the premises during the preceding calendar year, expressed in terms of pounds of VOC per gallon of solids. [RCSA 22a-174-32(d)(4)(B)]
 - e. The permittee shall keep the material safety data sheets (MSDS) or technical data sheets for all materials used. [RCSA 22a-174-32(g)(1)(B)]
 - f. The permittee shall maintain a daily record of the name, type, and quantity of any solvent that is used for wipe cleaning of the products. In addition, accurate daily records shall be kept of the quantity and type of solvents spilled, evaporated, or manifested as waste material. [RCSA 22a-174-4(d)(1)]
 - g. The permittee shall make, keep, and maintain any other records required to be kept by an individual permit, general permit, or order. [RCSA 22a-174-32(g)(2)]
 - h. The permittee shall maintain all records for at least 5 years at the premises, and make available at the premises for the Commissioner's inspection upon demand. [RCSA 22a-174-32(g)(1)]
 - i. The permittee shall keep records of the total weight, measured in pounds, of material produced in the calender lines including, but not limited to, sellable product, scrap and trimmings. [Consent Order #8237]
 - j. The permittee shall keep the results of any VOC emission capture and control testing performed at the premises. [Consent Order #8237]
 - k. The permittee shall make and keep daily records of the pressure drop of the FEC (measured in inches of water) and the variable frequency of the fan drive of the FEC. [Consent Order #8237]
 - l. The permittee shall keep a log of operating time for the capture system, control device, monitoring equipment, and the calender equipment. [Consent Order #8237]
 - m. The permittee shall keep a maintenance log for the capture system, control device, and monitoring equipment detailing all routine and maintenance performance including dates and duration of any outages. [Consent Order #8237]
 - n. The permittee shall keep each record required by this subsection for five years after the date that such record is made. [Consent Order #8237]

ii. *Pollutants or Process Parameters: Particulate Matter*

- a. The permittee shall keep records of particulate matter emissions during each and every consecutive twelve (12) months. [RCSA Section 22a-174-4(d)(1)]
- b. The permittee shall keep purchase records for all materials containing solids and condensable organic compounds that are used or stored at the premises. [RCSA Section 22a-174-4(d)(1)]
- c. The permittee shall keep a daily record of: [RCSA Section 22a-174-4(d)(1)]
 1. the number of raw material charged per calendering line;
 2. the weight of the raw material charges per calendering line;
 3. the solid content by weight (lb/gal) and percent of the raw material per calendering line;
 4. the volatile organic compounds content by weight (lb/gal) and percent of the raw material per calendering line; and

GEMU 1/ GEMU 2 & 3

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5. the amount in pounds of vinyl produced per run.

3. Reporting Requirements

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall submit to the Commissioner an annual VOC emissions summary report. [Consent Order #8237]
- b. To demonstrate compliance with the applicable requirement in Section III.A.1.ii of this permit, the report submitted by the permittee shall contain the monthly emissions of VOCs, expressed in pounds of VOCs generated from the calender lines per pound of material produced in the calender lines, for each month during the previous calender year. [Consent Order #8237]
- c. To demonstrate compliance with the applicable requirement in Section III.A.1.iii of this permit, the report submitted by the permittee shall contain the VOC emissions from the calender lines for each and every month consecutive 12-month period, which ended during the previous calender year, expressed as a twelve month aggregate. [Consent Order #8237]
- d. The report shall also contain a summary of the previous year's pressure drops and variable fan drive records of the FEC. [Consent Order #8237]
- e. The report shall be submitted to the Commissioner on or before January 30th of every calendar year. [Consent Order #8237]
- f. If a replacement capture system and/or control device is installed to control VOC emissions from the calender lines, within 30 days of installing such system or device, the permittee shall submit an updated VOC/RACT plan. The plan shall identify the replacement system and propose an emission testing schedule and relevant monitoring and data recording devices and procedures that have been implemented to determine continued compliance with capture and control efficiency requirements of this permit. Based on this plan, the permit may be modified to reflect changes in equipment identification, and monitoring and data recording devices and procedures.
- g. The permittee shall provide the records specified above to the Commissioner within thirty (30) days after receipt of a written request from the Commissioner. [RCSA 22a-174-32(g)(1)]

ii. *Pollutants or Process Parameters: Particulate Matter*

- a. The permittee shall provide the records specified above to the Commissioner within thirty (30) days after receipt of a written request from the Commissioner. [RCSA 22a-174-32(g)(1)]

B. GROUPED EMISSIONS UNITS 2 & 3 (GEMU 2 & 3)

The monitoring, record keeping, and reporting requirements shall be for each emissions units in the grouped emissions unit (GEMU 2 & 3).

1. Monitoring Requirements

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall calculate VOC emissions during each and every consecutive twelve (12) months. The VOC emissions shall be based on mass balance calculations. The annual usage shall be determine by the permittee by adding the current month's coating usage to that of the previous

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GEMU 2 & 3

eleven (11) months. These calculations shall be made by the permittee on a monthly basis and made available for inspection by the Department upon request. [RCSA 22a-174-33(j)(1)(K)]

- b. The permittee shall achieve the emission limits given in Section III. B & C of this permit for GEMU 2 & 3 respectively by the application of low solvent content coating technology for each coating used. [RCSA 22a-174-20(bb)(1)(A)]
- c. Upon written notification that the commissioner shall require emissions testing to demonstrate compliance VOC emissions, the permittee shall conduct such testing in accordance with such notification and section 22a-174-5 of the Regulations of Connecticut State Agencies. [RCSA 22a-174-5(e)(2)]

2. Record Keeping Requirements

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall keep purchase records for all coating containing VOC which are used or stored at the premises. [RCSA 22a-174-4(d)(1)]
- b. The permittee shall maintain daily records of the coating, which contain VOC, used on the premises. The records shall be used, by the permittee, in calculating the monthly VOC emissions and shall contain: [Section 22a-174-20(aa)(1); RCSA 22a-174-33(j)(K)(ii)]
 - 1. The name and address of the coating manufacturer;
 - 2. The date the coating is used;
 - 3. The description of the coating including the coating name and the coating density in pounds per gallon;
 - 4. The percent VOC content by weight;
 - 5. The water and exempt volatile organic compound content by weight of the coating;
 - 6. The non-volatile content by volume and by weight of the coating;
 - 7. The amount of each coating used in gallons;
 - 8. The total amount of diluent used for each coating in pounds and in gallons;
 - 9. The cumulative record of year-to-date coating usage in pounds per gallon;
 - 10. The coating viscosity in pounds VOC per pounds solid, or in kilograms VOC per kilogram solid.
 - 11. The material safety data sheets (MSDS) or technical data sheets for all coatings used.
- c. The permittee shall maintain a daily record of the name, type, and quantity of any solvent that is used for wipe cleaning of the products. In addition, accurate daily records shall be kept of the quantity and type of solvents spilled, evaporated, or manifested as waste material. [RCSA 22a-174-4(d)(1)]
- d. The permittee shall maintain all records for at least 5 years at the premises, and make available at the premises for the Commissioner's inspection upon demand. [RCSA 22a-174-33(o)(2)]

3. Reporting Requirements

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall provide the records specified above to the Commissioner within thirty (30) days after receipt of a written request from the Commissioner. [RCSA 22a-174-4(d)]

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C. EMISSIONS UNIT 10 (EMU 10)

1. Monitoring Requirements

i. Pollutants or Process Parameters: TSP

- a. The permittee shall calculate annual emissions for the annual emission statements using AP-42 engineering calculations, AP-42 Fifth Edition, Section 3.4. [RCSA Section 22a-174-4(d)(1)]
- b. If required by the Commissioner, the permittee shall measure TSP emissions using the average of three 1-hour EPA Method 5 stack test. [RCSA Section 22a-174-5(e)(2)]

ii. Pollutants or Process Parameters: SO_x

- a. The permittee shall verify emissions using fuel analysis on each fuel shipment. [RCSA Section 22a-174-19(a)(5)].
- b. Fuel analysis for the sulfur content of liquid fuels shall be done according to the most current American Society for Testing and Materials methods D 129, D 1552, D4292. [RCSA Section 22a-174-5(b)(1)].
- c. If required by the Commissioner, the permittee shall measure SO₂ emissions using EPA Method 6 stack test. [RCSA Section 22a-174-5(e)(2)]

2. Record Keeping Requirements

i. Pollutants or Process Parameters: TSP

- a. The permittee shall keep monthly and annual records of all fuel used. [RCSA 22a-174-4(d)(1)]
- b. The permittee shall maintain records of annual actual TSP emissions. The annual TSP emissions shall be calculated using emission factor obtained from stack testing or from the latest version of AP-42 and the fuel usage for the calendar year. [RCSA 22a-174-4(d)(1)]
- c. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA 22a-174-33(o)(2)]

ii. Pollutants or Process Parameters: SO_x

- a. The permittee shall maintain annual actual SO₂ emissions. The annual SO₂ emissions shall be calculated using emission factors obtained from stack testing or from the latest version of AP-42 and the fuel usage for the calendar year. [RCSA 22a-174-4(d)(1)]
- b. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA 22a-174-33(o)(2)]

Section IV: Compliance Demonstration

3. Reporting Requirements

i. Pollutants or Process Parameters: TSP

- a. The permittee shall provide all records to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [RCSA 22a-174-4(d)(1)]

ii. Pollutants or Process Parameters: SO_x

- a. The permittee shall provide all records to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [RCSA 22a-174-4(d)(1)]

Section V: Premises-wide General Requirements

Table V: PREMISES-WIDE GENERAL REQUIREMENTS

Pollutants or Process Parameters	Applicable Regulatory References/Citations	Limitations or Restrictions
Annual Emission Statements	RCSA 22a-174-4	The permittee shall submit annual emission inventory statements requested by the Commissioner as specified in RCSA § 22a-174-4(d)(1).
Emergency Episode Procedures	RCSA 22a-174-6	The permittee shall comply with the procedures for emergency episodes as specified in RCSA 22a-174-6.
Public Availability of Information	RCSA 22a-174-10	The public availability of information shall apply, as specified in RCSA 22a-174-10.
Prohibition against Concealment/circumvention	RCSA 22a-174-11	The permittee shall comply with the prohibition against concealment or circumvention as specified in RCSA 22a-174-11.
Opacity	RCSA 22a-174-18(b)(1)	Except as provided by RCSA 22a-174-18(j), the permittee shall not exceed the following visible emissions limits: [22a-174-18(b)(2)(A) & (B)] (A) Twenty percent (20%) opacity during any six-minute block average; or (B) Forty percent (40%) opacity during any one-minute block average.
Emission Fees	RCSA 22a-174-26	The permittee shall pay an emission fee in accordance with RCSA 22a-174-26(d).
VOC	RCSA 22a-174-32	The permittee shall comply with RCSA 22a-174-32, Reasonably Available Control Technology (RACT) for volatile organic compounds (VOC).

Section VI: Compliance Schedule

NOT APPLICABLE

TABLE VI.: COMPLIANCE SCHEDULE				
Emissions units	Applicable regulations	Steps required for achieving compliance (Milestones)	Date by which each step is to be completed	Dates for monitoring, record keeping, and reporting

Section VII: State Enforceable Terms and Conditions

Only the Commissioner of the Department of Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

- A.** This permit does not relieve the permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Environmental Protection or any federal, local or other state agency. Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the permittee by the Commissioner.
- C.** Odors: The permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises as set forth in RCSA Section 22a-174-23.
- D.** Noise: The permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4, inclusive.
- E.** Hazardous Air Pollutants (HAPs): The permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA Section 22a-174-29.
- F.** Open Burning: The permittee is prohibited from conducting open burning, except as may be allowed by CGS Section 22a-174(f).
- G.** Fuel Sulfur Content: The permittee shall not use #2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS Section 16a-21a.
- H.** Reporting of emissions of greenhouse gases: In accordance with CGS Section 22a-200b(b), not later than April 15, 2006, and annually thereafter, the owner or operator of any facility that is required to report air emissions data to the Department of Environmental Protection pursuant to Title V of the federal Clean Air Act and that has stationary emissions sources that emit greenhouse gases shall report to the regional registry direct stack emissions of greenhouse gases from such sources. The owner or operator shall report all greenhouse gas emissions in a type and format that the regional registry can accommodate.

Section VIII: Permit Shield

NO PERMIT SHEILD HAS BEEN GRANTED

Table VII: PERMIT SHIELD				
Regulated Pollutants	Emissions Units	Applicable Requirement or Non-Applicable Requirement Descriptions	Applicable Regulatory References/ Citations	*Permit Shield Indicate
N/A				

*For “Permit Shield Indicate”, use AR to indicate Applicable Requirement and NR for Non- Applicable Requirement

Section IX: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of Environmental Protection have the authority to enforce the terms and conditions contained in these sections.

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of the Assistant Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the U. S. Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; US EPA, Region 1; One Congress Street; Suite 1100 (SEA); Boston, MA 02114-2023.

B. CERTIFICATIONS [RCSA § 22a-174-33(b)]

In accordance with Section 22a-174-33(b) of the RCSA, any report or other document required by this Title V permit and any other information submitted to the Commissioner or Administrator shall be signed by an individual described in Section 22a-174-2a(a) of the RCSA, or by a duly authorized representative of such individual. Any individual signing any document pursuant to Section 22a-174-33(b) of the RCSA shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in Section 22a-174-2a(a)(4) of the RCSA:

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

Section IX: Title V Requirements

C. SIGNATORY RESPONSIBILITY [RCSA § 22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by section 22a-174-33 of the Regulations of Connecticut State Agencies, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to section 22a-174-33 of the Regulations of Connecticut State Agencies and either:

1. The facilities employ more than two-hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five (25) million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
 - (i) Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
 - (ii) Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
 - (iii) If a duly authorized representative is a named individual in an authorization submitted under subclause (ii) of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause (ii) of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

D. ADDITIONAL INFORMATION [RCSA § 22a-174-33(j)(1)(X)]

The permittee shall submit additional information in writing, at the Commissioner's request, within thirty (30) days of receipt of notice from the Commissioner or by such other date specified by the Commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending the permit or to determine compliance with the permit.

In addition, within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the changed, corrected, or omitted information to the Commissioner.

Section IX: Title V Requirements

E. MONITORING REPORTS [RCSA § 22a-174-33(o)(1)]

A permittee, required to perform monitoring pursuant this permit, shall submit to the Commissioner, on forms prescribed by the Commissioner, written monitoring reports on January 30 and July 30 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

F. PREMISES RECORDS [RCSA § 22a-174-33(o)(2)]

Unless otherwise required by this permit, the permittee shall make and keep records of all required monitoring data and supporting information for at least five (5) years from the date such data and information were obtained. The permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the Commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

G. PROGRESS REPORTS [RCSA § 22a-174-33(q)(1)]

The permittee shall, on January 30 and July 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner a progress report on forms prescribed by the Commissioner, and certified in accordance with Section 22a-174-2a(a)(5) of the RCSA. Such report shall describe the permittee's progress in achieving compliance under the compliance plan schedule contained in this permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in the permit which the permittee has met, and the dates on which they were met; and

Section IX: Title V Requirements

2. Identify those obligations under the compliance plan schedule in this permit which the permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the permittee expects to meet them.

Any progress report prepared and submitted pursuant to Section 22a-174-33(q)(1) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

H. COMPLIANCE CERTIFICATIONS [RCSA § 22a-174-33(q)(2)]

The permittee shall, on January 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner, a written compliance certification certified in accordance with Section 22a-174-2a(a)(5) of the RCSA and which includes the information identified in Title 40 CFR 70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to Section 22a-174-33(q)(2) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

I. PERMIT DEVIATION NOTIFICATIONS [RCSA § 22a-174-33(p)]

Notwithstanding Subsection D of Section IX of this permit, the permittee shall notify the Commissioner in writing, on forms prescribed by the Commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than twenty-four (24) hours after such deviation commenced;
and
2. For any other regulated air pollutant, no later than ten (10) days after such deviation commenced.

J. PERMIT RENEWAL [RCSA § 22a-174-33(j)(1)(B)]

All of the terms and conditions of this permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with Sections 22a-174-33(g), -33(h), and -33(i) of the RCSA.

K. OPERATE IN COMPLIANCE [RCSA § 22a-174-33(j)(1)(C)]

The permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

Section IX: Title V Requirements

L. COMPLIANCE WITH PERMIT [RCSA § 22a-174-33(j)(1)(G)]

This permit shall not be deemed to:

1. preclude the creation or use of emission reduction credits or the trading of such credits in accordance with Sections 22a-174-33(j)(1)(I) and 22a-174-33(j)(1)(P) of the RCSA, provided that the Commissioner's prior written approval of the creation, use, or trading is obtained;
2. authorize emissions of an air pollutant so as to exceed levels prohibited under 40 CFR Part 72;
3. authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. impose limits on emissions from items or activities specified in Sections 22a-174-33(g)(3)(A) and (B) of the RCSA unless imposition of such limits is required by an applicable requirement.

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA § 22a-174-33(j)(1)(M)]

The Commissioner may, for the purpose of determining compliance with the permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under the permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

N. PERMIT AVAILABILITY

The permittee shall have available at the facility at all times a copy of this Title V Operating Permit.

O. SEVERABILITY CLAUSE [RCSA § 22a-174-33(j)(1)(R)]

The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the remainder of this permit and the application of such provision to other circumstances shall not be affected.

P. NEED TO HALT OR REDUCE ACTIVITY [RCSA § 22a-174-33(j)(1)(T)]

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Q. PERMIT REQUIREMENTS [RCSA § 22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the permittee's obligation to comply with this permit.

Section IX: Title V Requirements

R. PROPERTY RIGHTS [RCSA § 22a-174-33(j)(1)(W)]

This permit does not convey any property rights or any exclusive privileges. This permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including Section 4-181a(b) of the Connecticut General Statutes and Section 22a-3a-5(b) of the RCSA. This permit shall neither create nor affect any rights of persons who are not parties to this permit.

S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA § 22a-174-33(o)(3)]

The permittee shall, contemporaneously with making a change authorized by this permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA § 22a-174-33(r)(2)]

The permittee may engage in any action allowed by the Administrator in accordance with 40 CFR 70.4(b)(12)(i) to (iii)(B) inclusive, and 40 CFR 70.4(b)(14)(i) to (iv), inclusive without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. constitute a modification under 40 CFR 60, 61 or 63,
2. exceed emissions allowable under the subject permit,
3. constitute an action which would subject the permittee to any standard or other requirement pursuant to 40 CFR 72 to 78, inclusive, or
4. constitute a non-minor permit modification pursuant to Section 22a-174-2a(d)(4) of the RCSA.

At least seven (7) days before initiating an action specified in Section 22a-174-33(r)(2)(A) of the RCSA, the permittee shall notify the Administrator and the Commissioner in writing of such intended action.

U. INFORMATION FOR NOTIFICATION [RCSA § 22a-174-33(r)(2)(A)]

Written notification required under Section 22a-174-33(r)(2)(A) of the RCSA shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The permittee shall thereafter maintain a copy of such notice with the Title V permit. The Commissioner and the permittee shall each attach a copy of such notice to their copy of the permit.

Section IX: Title V Requirements

V. TRANSFERS [RCSA § 22a-174-2a(g)]

No person other than the permittee shall act or refrain from acting under the authority of this permit unless this permit has been transferred to another person in accordance with Section 22a-174-2a(g) of the RCSA.

The proposed transferor and transferee of a permit shall submit to the Commissioner a request for a permit transfer on a form provided by the Commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The Commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS Section 22a-6m.

W. REVOCATION [RCSA § 22a-174-2a(h)]

The Commissioner may revoke this permit on his own initiative or on the request of the permittee or any other person, in accordance with Section 4-182(c) of the Connecticut General Statutes, Section 22a-3a-5(d) of the RCSA, and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The permittee requesting revocation of this permit shall state the requested date of revocation and provide the Commissioner with satisfactory evidence that the emissions authorized by this permit have been permanently eliminated.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this permit if the Administrator has determined that the Commissioner failed to act in a timely manner on a permit renewal application.

This permit may be modified, revoked, reopened, reissued, or suspended by the Commissioner, or the Administrator in accordance with Section 22a-174-33(r) of the RCSA, Connecticut General Statutes Section 22a-174c, or Section 22a-3a-5(d) of the RCSA.

X. REOPENING FOR CAUSE [RCSA § 22a-174-33(s)]

This permit may be reopened by the Commissioner, or the Administrator in accordance with Section 22a-174-33(s) of the RCSA.

Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this permit, for the purpose of determining compliance or establishing whether a permittee has violated or is in violation of any permit condition, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information.